

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

GENESIS MOSES and PAMELA HUNT,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

PACIFIC MARKET INTERNATIONAL, LLC,

Defendant.

Civil Action No. 3:24-cv-00247-RJC-DCK

DEFENDANT’S NOTICE OF PENDENCY OF OTHER ACTIONS

Defendant Pacific Market International, LLC (“PMI”), by and through its undersigned attorneys, states that the following four cases involve all or a material part of the subject matter of this action brought by Plaintiffs Genesis Moses and Pamela Hunt (“*Moses*”):

1. *Mackenzie Brown, et al. v. Pacific Market International, LLC, et al.*, United States District Court for the Central District of California, Case No. 2:24-cv-01765, filed in the Superior Court of the State of California for the County of Los Angeles on February 1, 2024, removed to the United States District Court for the Central District of California on March 4, 2024;
2. *Mariana Franzetti v. Pacific Market International, LLC, d/b/a PMI Worldwide*, United States District Court for the Western District of Washington, Case No. 2:24-cv-00191-TL, filed on February 12, 2024;
3. *Robin Krohn v. Pacific Market International, LLC*, United States District Court for the Western District of Washington, Case No. 2:24-cv-00200-TL, filed on February 14, 2024; and

4. *Laura Barbu v. Pacific Market International, LLC*, United States District Court for the Western District of Washington, Case No. 2:24-cv-00258-TL, filed on February 24, 2024.

Brown, Franzetti, Krohn, Barbu, and Moses are each putative consumer class actions alleging that PMI failed to disclose that its Stanley cups contain lead.

PMI is the only defendant in each case. The complaints in *Franzetti, Krohn, and Barbu*, purport to represent the same national class of purchasers of PMI's Stanley cups as Plaintiffs here seek to represent in *Moses*. The *Barbu* plaintiff also purports to represent a separate state subclass of all such purchasers residing in New York, the *Brown* plaintiffs also purport to represent a state class of all such purchasers residing in California, and the *Moses* plaintiffs also purport to represent a separate state subclass of all such purchasers residing in North Carolina. All of the purchasers in these proposed state classes are subsumed by the national classes asserted in *Franzetti, Krohn, Barbu, and Moses*.

The names of the parties, and the names, addresses, and telephone numbers of their attorneys in these actions, are as follows:

Mackenzie Brown, et al. v. Pacific Market International, LLC, United States District Court for the Central District of California, Case No. 2:24-cv-01765-ODW-AJR

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Robin Krohn v. Pacific Market International, LLC, United States District Court for the Western District of Washington, Case No. 2:24-cv-00200-TL

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Laura Barbu v. Pacific Market International, LLC, United States District Court for the Western District of Washington, Case No. 2:24-cv-00258-LK

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Dated: March 21, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on March 21, 2024, a copy of the foregoing was electronically filed with the Clerk of Court of the United States District Court for the Western District of North Carolina, using the CM/ECF system, which will send a Notice of Electronic filing to all parties of record.

Dated: March 21, 2024

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